

HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

TIANNA HATLEBERG,

Plaintiff,

vs.

THE BOEING COMPANY and NEWCO, INC.  
d/b/a CASCADE COLUMBIA  
DISTRIBUTION COMPANY,

Defendants.

Case No. 2:20-cv-00464-JLR

**STIPULATION EXTENDING TIME  
FOR DEFENDANT NEWCO, INC. D/B/A  
CASCADE COLUMBIA  
DISTRIBUTION COMPANY TO  
ANSWER OR OTHERWISE RESPOND  
TO COMPLAINT**

**Noted for Consideration: April 28, 2020**

**STIPULATION**

1. The parties, through counsel, stipulate and agree that good cause exists to extend the deadline for defendant New Co, Inc. d/b/a Cascade Columbia Distribution Company (“Newco”) to answer or otherwise respond to Plaintiff’s Complaint.

2. On March 27, 2020, Defendant The Boeing Company (“Boeing”) removed this case from the Superior Court of the State of Washington for King County.

3. Three other plaintiffs filed similar complaints in the Superior Court of Washington, King County, all of which Boeing also removed to this Court on March 27, 2020. They are: (a) Ashley Wahl, *see Wahl v. The Boeing Co. et al.*, U.S.D.C., W.D. Wash. Case No. 2:20-cv-00467-JLR; (b) Marie Riley, *see Riley v. The Boeing Co. et al.*, U.S.D.C., W.D. Wash.

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STIPULATION EXTENDING TIME FOR DEFENDANT  
NEWCO, INC. D/B/A CASCADE COLUMBIA  
DISTRIBUTION COMPANY TO ANSWER OR  
OTHERWISE RESPOND TO COMPLAINT – Page 1

**GORDON REES SCULLY MANSUKHANI, LLP**  
1300 SW Fifth Avenue, Suite 2000  
Portland, OR 97201  
Telephone: (503) 382-3852  
Facsimile : (503) 616-3600

Case No. 2:20-cv-00458-JLR; and (c) Dana Ford as guardian of N.F., *see Ford v. The Boeing Co. et al.*, U.S.D.C., W.D. Wash. Case No. 2:20-cv-00463-JLR.

4. The Plaintiffs in each of these four cases are represented by the same undersigned plaintiffs' counsel. Newco is represented in each of the four cases by the same undersigned defense counsel.

5. The Plaintiffs filed motions to remand in each of these four cases on April 27, 2020.

6. The parties agree that it would be in the interests of efficiency, and would conserve the parties' and the Court's resources, if the parties were first to brief and resolve Plaintiff's motion to remand, and then turn to Newco's answer or potential motion to dismiss should the Court deny remand.

7. Therefore, the parties stipulate and agree that the deadline for Newco's answer or other initial response to the Complaint should be extended to twenty-one (21) days following the Court's order resolving Plaintiff's motion to remand.

IT IS SO STIPULATED:

Date: April 28, 2020

Date: April 28, 2020

/s/ Susan Ulrich

Brian D. Weinstein, WSBA No. 24497  
Alexandra Caggiano, WSBA No. 47862  
Phillip A. Chu, WSBA No. 46014  
[service@weinsteincaggiano.com](mailto:service@weinsteincaggiano.com)

Susan Ulrich, admitted *Pro Hac Vice*  
[sulrich@waterskraus.com](mailto:sulrich@waterskraus.com)  
*Attorneys for Plaintiff*

/s/ Nancy M. Erfle

Nancy M. Erfle, WSBA No.: 20644  
[nerfle@grsm.com](mailto:nerfle@grsm.com)  
Kelly F. Huedepohl, WSBA No.: 53456  
[khuedepohl@grsm.com](mailto:khuedepohl@grsm.com)  
*Attorneys for Defendant Newco, Inc. d/b/a  
Cascade Columbia Distribution Company*

STIPULATION EXTENDING TIME FOR DEFENDANT  
NEWCO, INC. D/B/A CASCADE COLUMBIA  
DISTRIBUTION COMPANY TO ANSWER OR  
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**CERTIFICATE OF SERVICE**

I certify under penalty of perjury under the laws of the State of Washington that I am over the age of 18, and on this date I caused a copy of the foregoing **STIPULATION EXTENDING TIME FOR DEFENDANT NEWCO, INC. D/B/A CASCADE COLUMBIA DISTRIUBTION COMPANY TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT** to be served as stated below:

☒ by transmitting via electronic delivery (e-mail) the attached document(s) to the e-mail address(es) set forth below.

☒ by transmitting via electronic delivery the attached document(s) to all attorneys of record using the CM/ECF system.

Brian D. Weinstein, WSBA No. 24497 Alexandra B. Caggiano, WSBA No. 47862 Phillip A. Chu, WSBA No. 46014 Weinstein Caggiano PLLC 601 Union Street, Suite 2420 Seattle, Washington 98101 <a href="mailto:service@weinsteincaggiano.com">service@weinsteincaggiano.com</a> <i>Attorneys for Plaintiff</i>	Susan Ulrich, WSBA No. 54568 Waters Kraus & Paul 222 N Sepulveda, Suite 1900 El Segundo, CA 90245 <a href="mailto:sulrich@waterskraus.com">sulrich@waterskraus.com</a> <a href="mailto:bandrews@waterskraus.com">bandrews@waterskraus.com</a> <a href="mailto:mconnett@waterskraus.com">mconnett@waterskraus.com</a> <a href="mailto:kloew@waterskraus.com">kloew@waterskraus.com</a> <i>Attorneys for Plaintiff</i>
Victoria Phillips Diane Paolicelli Phillips & Paolicelli, LLP 747 Third Avenue, 6th floor New York, NY 10017 <a href="mailto:vphillips@p2law.com">vphillips@p2law.com</a> <a href="mailto:dpaolicelli@p2law.com">dpaolicelli@p2law.com</a> <i>Attorneys for Plaintiff</i>	David C. Strouss Brad J. Mitchell Thornton Law Firm 1 Lincoln St., 13th Fl. State Street Financial Center Boston, MA 02111 <a href="mailto:dstrouss@tenlaw.com">dstrouss@tenlaw.com</a> <a href="mailto:bmitchell@tenlaw.com">bmitchell@tenlaw.com</a> <i>Attorneys for Plaintiff</i>
Todd W. Rosencrans, WSBA No. #26551 Monique Wirrick, WSBA No. 34093 Perkins Coie LLP 1201 Third Avenue, Suite 4900 Seattle, WA 98101-3099 <a href="mailto:TRosencrans@perkinscoie.com">TRosencrans@perkinscoie.com</a> <a href="mailto:MWirrick@perkinscoie.com">MWirrick@perkinscoie.com</a> <i>Attorneys for Defendant The Boeing Company</i>	

**I declare under penalty of perjury under the laws of the State of Washington that the above is true and correct.**

DATED this 28th day of April, 2020 at Portland, Oregon.

GORDON REES SCULLY MANSUKHANI LLP

By:   
 Heather A. Coffey, Legal Assistant

HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

TIANNA HATLEBERG,

Plaintiff,

vs.

THE BOEING COMPANY and NEWCO, INC.  
d/b/a CASCADE COLUMBIA  
DISTRIBUTION COMPANY,

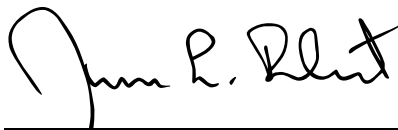
Defendants.

Case No. 2:20-cv-00464-JLR

**ORDER GRANTING EXTENSION OF  
TIME FOR DEFENDANT NEWCO, INC.  
D/B/A CASCADE COLUMBIA  
DISTRIBUTION COMPANY TO  
ANSWER OR OTHERWISE RESPOND  
TO COMPLAINT**

Based on the stipulation of the parties, it is HEREBY ORDERED that the deadline for defendant Newco, Inc. d/b/a Cascade Columbia Distribution Company to answer or otherwise respond to the complaint is extended to twenty-one (21) days following the Court's order resolving Plaintiff's motion to remand.

DATED this 30th day of April, 2020.



HONORABLE JAMES L. ROBART  
United States District Court Judge